

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

**This Document Relates to the TPP Trial
Subclasses**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**ZHP DEFENDANTS' NOTICE OF
MOTIONS IN LIMINE¹**

¹ These Motions in Limine concern the claims designated in the Court's Case Management Order No. 32 (the "TPP Trial Claims"), specifically, the claims of Plaintiff MSP Recovery Claims, Series LLC, as class representative of TPP Breach of Express Warranty subclass b, TPP Breach of Implied Warranty subclass d, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a, against the TPP Trial Defendants. (ECF [2343](#) at 1-2.)

PLEASE TAKE NOTICE that on March 18, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order excluding certain evidence from trial of this matter. This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to the Federal Rules of Evidence and the applicable local rules of this Court.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum of Law in Support of ZHP Defendants’ Motions in Limine and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith;

PLEASE TAKE FURTHER NOTICE that oral argument is requested, if this motion is opposed; and

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: February 16, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
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Inc., Princeton Pharmaceutical Inc., and
Solco Healthcare U.S., LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 16, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson
Jessica Davidson